IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TARIQ BHATTI, Plaintiff, v. J.P. MORGAN CHASE, a Delaware corporation, Defendant.	)))))))))	C.A. No. 05-690 KAJ

**DEFENDANT'S RESPONSES TO
PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT**

1. Attached hereto as Exhibit No. 1, is a list of positions at J.P. Morgan Chase, for which the plaintiff applied between April 4, 2005 and July 23, 2003. For each position, please provide the following: All documents relating to the plaintiff's application for such position; all documents relating to the application of the individual who received or was awarded the position; all documents relating to, pertaining to, or evaluating the qualifications of the plaintiff for such position; all documents relating to, pertaining to, evaluation the qualifications of the applicant who was awarded or received the position, all documents relating to, pertaining to, or mentioning the reasons why the plaintiff did not receive such position.

RESPONSE: Objection. This request is overly broad, unduly burdensome and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to supplement this response if additional responsive documents are located. Subject to and without waiving such objections and reservations, Defendant is producing or has produced documents numbered as follows:

List No.	Requisition Number and Job Title	Documents
23	No. 030010981 Operations Unit Manager (canceled)	D00020-23, D00855-858
24	No. 030013375 Private Banking Fee Billing Team Leader	D00020-23, D00352-376, D00716-720, D00960-961, D01001-1004
25	No. 030013403 Operations Unit Manager	D00020-23, D00377-396, D00854, D00962-968, D01005-1007, D01070

List No.	Requisition Number and Job Title	Documents
22	No. 030015978 Private Banking Client Statements Q/A and Rendering Manager	D00020-23, D00397-408, D00725-729, D00859-863, D01008-1011
19	No. 030018111 Operations Supervisor	D00020-23, D00867-868
17	No. 030018349 IBO-Corporate Actions Specialist (canceled)	D00020-23, D00421-428, D00871-877, D01012-1014
20	No. 030018647 Trader Support Specialist	D00020-23, D00429-457, D00733-737, D01015-1017
21	No. 030019098 IBO Prime Brokerage Settlement Specialist (canceled)	D00020-23, D00864-866
16	No. 030019100 IBO Prime Brokerage Quality Assurance and Control (canceled)	D00020-23, D00878-879
18	No. 030020493 Operations Unit Manager (canceled)	D00020-23, D00869-870
8	No. 030021095 Compensation Manager	D00020-23, D00458-460, D00905-909, D01018-1020
9	No. 030021187 IB Operations Unit Manager	D00020-23, D00461-472, D00721-724, D00901-904, D01021-1023
15	No. 030021246 Trade Support Manager - Chase Home Finance (canceled)	D00020-23, D00880-881
13	No. 030021768 Senior Securities Specialist	D00020-23, D00531-552, D00738-751, D00884-895, D01024-1026
11	No. 030021842 Operations Unit Manager (canceled)	D00020-23, D00897-898
14	No. 030021888 Operations Supervisor (canceled)	D00020-23, D00495-499, D00882-883
10	No. 030022211 Operations Section Manager (canceled)	D00020-23, D00889-900
7	No. 030022719 Operations Section Manager	D00020-23, D00500-513, D00752-758, D00910-919, D01027-1029

List No.	Requisition Number and Job Title	Documents
12	No. 040000502 Manager Private Banking Reconciliations & T&I Journal	D00020-23, D00514-523, D00759-761, D00830-831, D00893-896, D01030-1032
6	No. 040002506 Operations Unit Manager (canceled)	D00020-23, D00920-921
5	No. 040002783 Private Bank Security International Settlement Manager	D00020-23, D00922-935
4	No. 040008129 Manager P Bkg Security Intl Settlement	None (requisition does not exist)
3	No. 040010298 Reconciliation Control Unit Manager	D00553-562, D00936-947, D00969-976, D01033-1036
2	No. 040012913 Quality Control Specialist / PB Fee Billing	D00563-572, D00977-986, D01037-1039
1	No. 050013769 Options Operations Supervisor Associate	D00573-582, D00954-959, D00987-995, D001040-1042
6[1]	April 2004 No Number Temporary Fee Billing Processing Position (through Integrity Staffing Solutions)	Not Available (information belongs to Integrity Staffing Solutions, Inc.)

YOUNG, CONAWAY, STARGATT & TAYLOR

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Dated: August 7, 2006

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[1] Bhatti's list contains two items numbered "6."